

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

123. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

²¹¹ Ex. 52.01, CLINKFAC0797B, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC136216 CenturyLink - Verizon South Claim; BAN: 412M520008196, dated Apr. 21, 2017.

²¹² *Id.*

²¹³ *Id.*

²¹⁴ See the documents labeled, "Verizon Invalid FMS Conversion" in Exhibits 53, 54, 57, 58, 61, 65, and 67 for summaries of these claims.

[REDACTED]

[REDACTED]²¹⁵

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

125. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

²¹⁵ Ex. 53.05, FMS CLINKFAC0391, Email from Anna McDermott (Verizon) to Anne Grimm (CenturyLink), *FMS Conversion - Impact*, dated Apr. 23, 2014.

²¹⁶ *Id.* **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]**

[illegible]

²¹⁸ Ex. 53.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC106291 CenturyLink - Verizon South Claim; BAN: See attached details, dated Sep. 30, 2015; Ex. 54.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC106292 CenturyLink - Verizon South Claim; BAN: See attached details, dated Sep. 30, 2015; Ex. 57.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC106348 CenturyLink - Verizon North Claim; BAN: See attached details, dated Sep. 30, 2015; Ex. 58.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC106294 CenturyLink - Verizon North Claim; BAN: See attached details, dated Sep. 30, 2015.

²²⁰ Ex. 61.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC107903 CenturyLink - Verizon South Claim; BAN: See attached details*, dated Oct. 29, 2015; Ex. 65.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC107905 CenturyLink - Verizon North Claim; BAN: See attached details*, dated Oct. 29, 2015; Ex. 67.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW:*

[REDACTED]

127. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CCQWC107906 CenturyLink - Verizon West Claim; BAN: 202M910005001, dated Oct. 29, 2015.

²²¹ See, e.g., Ex. 53.02, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863422*, dated Oct. 29, 2015; Ex. 53.03, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863539*, dated Oct. 29, 2015; Ex. 54.02, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863455*, dated Oct. 29, 2015; Ex. 54.03, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863543*, dated Oct. 29, 2015; Ex. 57.02, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863549*, dated Oct. 29, 2015; Ex. 57.03, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863553*, dated Oct. 29, 2015; Ex. 58.02, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40863547*, dated Oct. 29, 2015; Ex. 67.02, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40868952*, dated Oct. 30, 2015.

²²² See the documents labeled, "Verizon Invalid FMS Conversion" in Exhibits 55, 56, 59, 60, 62-64, 66, and 68 for summaries of these claims.

128. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

129. [REDACTED]

[REDACTED]

224

²²³ Ex. 55.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115124 CenturyLink - Verizon South Claim; BAN: See attached details*, dated Mar. 10, 2016; Ex. 56.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115123 CenturyLink - Verizon South Claim; BAN: See attached details*, dated Mar. 10, 2016; Ex. 59.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115122 CenturyLink - Verizon North Claim; BAN: 212M110139500*, dated Mar. 10, 2016; Ex. 60.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115121 CenturyLink - Verizon North Claim; BAN: See attached details*, dated Mar. 10, 2016; Ex. 62.01, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40868956*, dated Oct. 29, 2015; Ex. 63.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115120 CenturyLink - Verizon South Claim; BAN: See attached details*, dated Mar. 10, 2016; Ex. 64.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115119 CenturyLink - Verizon South Claim; BAN: See attached details*, dated Mar. 10, 2016; Ex. 66.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115118 CenturyLink - Verizon North Claim; BAN: See attached details*, dated Mar. 10, 2016; Ex. 68.01, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC115117 CenturyLink - Verizon West Claim; BAN: 202M910005001*, dated Mar. 10, 2016.

²²⁴ See Exhibits 53 through 68 for material related to the FMS claim submissions.

[REDACTED]

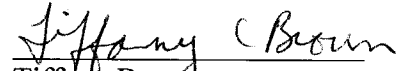
[REDACTED]

[[END CONFIDENTIAL]]

PUBLIC VERSION

CERTIFICATION

I certify under penalty of perjury that the foregoing is true and correct. Executed on February
23rd 2018.


Tiffany Brown

Tab D

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)

CenturyLink Communications, LLC)
f/k/a Qwest Communications Company,)
LLC,)

Complainant,)

v.)

Docket No. 18-33
File No. EB-16-MDIC-0015

Verizon Services Corp.; Verizon)
Virginia LLC; Verizon Washington,)
D.C., Inc.; Verizon Maryland LLC;)
Verizon Delaware LLC; Verizon)
Pennsylvania LLC; Verizon New Jersey)
Inc.; Verizon New York Inc.; Verizon)
New England Inc.; Verizon North LLC;)
Verizon South Inc.,)

Defendants.)

DECLARATION OF PATRICK WELCH

I, Patrick Welch, of full age, hereby declare and certify as follows:

1. I have been employed with CenturyLink for over twenty-two years, and currently serve as Manager of Finance in the Facility Cost group at CenturyLink Communications, LLC ("CenturyLink"), a position I have held since 2009. In that position, [[BEGIN

CONFIDENTIAL]]

[[END CONFIDENTIAL]]

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

2. Specifically, I am familiar with the **[[BEGIN CONFIDENTIAL]]** [REDACTED]
[REDACTED] **[[END CONFIDENTIAL]]** Verizon Services Corp. and its related
operating companies (collectively, “Verizon”) in connection with the special access services that
CenturyLink received. This familiarity extends to the **[[BEGIN CONFIDENTIAL]]** [REDACTED]
[REDACTED] **[[END CONFIDENTIAL]]** that CenturyLink should have received under the tariffs
and to CenturyLink’s efforts to dispute Verizon’s overcharges, **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]] I am also familiar with Verizon's responses to those dispute submissions.

3. **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]]

4. I have reviewed the affidavit of Tiffany Brown. **[[BEGIN CONFIDENTIAL]]**

[[END CONFIDENTIAL]]

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

5. Based on my role as Manager of Finance at CenturyLink, [[BEGIN
CONFIDENTIAL]] [REDACTED]
[REDACTED] [[END
CONFIDENTIAL]] Similarly, based on my role at CenturyLink, [[BEGIN
CONFIDENTIAL]] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [[END CONFIDENTIAL]]

6. My knowledge and role in this dispute with Verizon is further discussed below.

I. [[BEGIN CONFIDENTIAL]] [REDACTED] [[END
CONFIDENTIAL]]

7. For the time periods relevant to this dispute with Verizon, [[BEGIN
CONFIDENTIAL]] [REDACTED]
[REDACTED]

8. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

9. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

II. [REDACTED]

10. [REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]¹

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ See, e.g., Brown Decl., at ¶ 34.

13. [REDACTED]

[REDACTED]

[REDACTED]

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

III. [REDACTED]

16. [REDACTED]

[REDACTED]

[REDACTED]

² Brown Decl., at ¶ 37.

³ Brown Decl., at ¶¶ 9-15.

⁴ Brown Decl., at ¶¶ 2-3.

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

[REDACTED]

[REDACTED]

17. [REDACTED]

[REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁸ [[END

CONFIDENTIAL]]

⁵ Brown Decl., at ¶¶ 33-129.

⁶ *See, e.g.*, Brown Decl., at ¶¶ 87-92.


⁷ Brown Decl., at ¶¶ 52, 56.

⁸ *See, e.g.*, Brown Decl. ¶ 37.

PUBLIC VERSION

CERTIFICATION

I certify under penalty of perjury that the foregoing is true and correct. Executed on February
22, 2018.



Patrick Welch

Tab E

PUBLIC VERSION

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)

CenturyLink Communications, LLC)
f/k/a Qwest Communications Company,)
LLC,)

Complainant,)

v.)

Verizon Services Corp.; Verizon)
Virginia LLC; Verizon Washington,)
D.C., Inc.; Verizon Maryland LLC;)
Verizon Delaware LLC; Verizon)
Pennsylvania LLC; Verizon New Jersey)
Inc.; Verizon New York Inc.; Verizon)
New England Inc.; Verizon North LLC;)
Verizon South Inc.,)

Defendants.)

Docket No. 18-33

File No. EB-16-MDIC-0015

INFORMATION DESIGNATION OF CENTURYLINK COMMUNICATIONS, LLC

CenturyLink Communications LLC, f/k/a Qwest Communications Company, LLC
("CenturyLink"), through its attorneys, submits this information designation in connection with
the above-captioned formal complaint against Verizon Services Corp., et al. ("Verizon"), in
accordance with Sections 1.721(a)(10)(i), (iii), and 1.721(a)(11) of the Federal Communications

PUBLIC VERSION

Commission's ("Commission") Rules, 47 C.F.R. §§ 1.721(a)(10)(i), (iii) and 1.721(a)(11) and with the Commission's February 9, 2018 order granting related waivers.¹

I. INDIVIDUALS BELIEVED TO HAVE FIRST-HAND KNOWLEDGE

Pursuant to 47 C.F.R. § 1.721(a)(10)(i), CenturyLink has set forth below the names, addresses, and positions of the principal individuals at CenturyLink and its third-party vendors or, to CenturyLink's knowledge, at Verizon, who CenturyLink believes to have first-hand knowledge of the facts alleged with particularity in CenturyLink's Formal Complaint, along with a general description of the facts within such individual's knowledge. CenturyLink reserves the right to amend this list as appropriate based on discovery or additional information.

1. Name: Tiffany Brown
Address: Synchronoss Technologies, Inc., 12102 Sunset Hills Rd., Reston, VA 20190
Position: Third-party Auditing Vendor for CenturyLink
Description of facts within this person's knowledge: Overall knowledge of the dispute with Verizon, including knowledge of the agreements and the tariffs, credit calculations, discovery of Verizon's billing and credit errors, and dispute submissions.
2. Name: Patrick Lowell
Address: Synchronoss Technologies, Inc., 12102 Sunset Hills Rd., Reston, VA 20190
Position: Third-party Auditing Vendor for CenturyLink
Description of facts within this person's knowledge: Overall knowledge of the dispute with Verizon, including knowledge of the agreements and the tariffs, credit calculations, discovery of Verizon's billing and credit errors, and dispute submissions.

¹ The Commission has waived the requirement in Section 1.721(a)(10)(ii) of the Rules, 47 C.F.R. § 1.721(a)(10)(ii), for the complainant to provide a description of all documents and other information in its possession that are relevant to the facts alleged in the complaint. *See* February 9 Letter Ruling. Pursuant to the Commission's letter ruling, and as more fully described in this Information Designation, CenturyLink has attached as exhibits to its pleadings copies of the affidavits, documents, data compilations and tangible things in its possession, custody, or control, upon which it relies or intends to rely to support the facts alleged and legal arguments made in its pleadings.

PUBLIC VERSION

3. Name: Patrick Welch
 Address: CenturyLink Communications, LLC, 5325 Zuni Street, 3rd Floor,
 Denver, CO 80221
 Position: Manager of Finance
 Description of facts within this person's knowledge: Overall knowledge of the
 dispute with Verizon, including knowledge of Verizon's billing procedures and
 credit errors, and dispute submissions.
4. Name: Adam Sherr
 Address: CenturyLink Communications, LLC, 1600 7th Avenue, Room 1506
 Seattle, WA 98191
 Position: Associate General Counsel
 Description of facts within this person's knowledge: Knowledge of the
 agreements and tariffs with Verizon.
5. Name: Joe Romero
 Address: CenturyLink Communications, LLC, 5325 Zuni Street, 3rd Floor,
 Denver, CO 80221
 Position: Senior Financial Analyst
 Description of facts within this person's knowledge: Knowledge of the dispute
 submissions to Verizon.
6. Name: Robert Montenegro
 Address: CenturyLink Communications, LLC, 2355 Dulles Corner Boulevard,
 Herndon, VA 20171
 Position: Senior Lead Carrier Relations Consultant
 Description of facts within this person's knowledge: Knowledge of Verizon's
 billing and credit practices.
7. Name: Anne Grimm
 Address: CenturyLink Communications, LLC, 4650 Lakehurst Road, Dublin, OH
 43016
 Position: Senior Lead Carrier Relations Consultant
 Description of facts within this person's knowledge: Knowledge of Verizon's
 billing and credit practices.
8. Name: Patricia Mason
 Address: Verizon, 6929 North Lakewood Avenue, Tulsa, OK 74117
 Position: Marketing Operations
 Description of facts within this person's knowledge: Knowledge of the billing
 credits and disputes with CenturyLink.
9. Name: Bradley Rhotenberry
 Address: Verizon, 6929 North Lakewood Avenue, Tulsa, OK 74117

PUBLIC VERSION

Position: Senior Analyst, Wireline Revenue Assurance, Contracts & Rate Management

Description of facts within this person's knowledge: Knowledge of the billing credits and disputes with CenturyLink.

10. Name: Henry Ludolph
Address: Verizon, 6929 North Lakewood Avenue, Tulsa, OK 74117
Position: Supervisor, Wholesale Financial Operations
Description of facts within this person's knowledge: Knowledge of the billing credits and disputes with CenturyLink.
11. Name: David Szol
Address: Verizon, 6929 North Lakewood Avenue, Tulsa OK 74117
Position: Senior Manager, Wholesale Financial Operations
Description of facts within this person's knowledge: Knowledge of the billing credits and disputes with CenturyLink.
12. Name: Curtis Groves
Address: Verizon, 1300 I Street NW, Suite 400W, Washington, D.C. 20005
Position: Assistant General Counsel, Federal Regulatory and Legal Affairs
Description of facts within this person's knowledge: Knowledge of Verizon's agreements and tariffs and CenturyLink's disputes.
13. Name: William Carnell
Address: Verizon, 1320 N. Court House Road, Arlington, VA 22201
Position: Assistant General Counsel
Description of facts within this person's knowledge: Knowledge of Verizon's agreements and tariffs and CenturyLink's disputes.
14. Name: Joe Aguilar
Address: Verizon, address unknown.
Position: Consultant, Verizon Corporate Finance
Description of facts within this person's knowledge: Knowledge of CenturyLink's dispute submissions, Verizon's credit calculations, and Verizon's dispute denials.
15. Name: Chuck Wasserott
Address: Verizon, 6929 North Lakewood Avenue, Tulsa, OK 74117
Position: Director Enterprise & Wholesale Collections
Description of facts within this person's knowledge: Knowledge of the billing credits and disputes with CenturyLink.
16. Name: Chris Alston
Address: Verizon, address unknown.
Position: Unknown.

PUBLIC VERSION

Description of facts within this person's knowledge: Knowledge of the billing credits and disputes with CenturyLink.

II. DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE THINGS

Pursuant to Section 1.721(a)(ii) of the Commission's Rules, 47 C.F.R. § 1.721(a)(10)(ii), and the Commission's February 9, 2018 Letter Ruling granting the parties' joint request for a waiver in connection with that provision, CenturyLink states that, in lieu of the requirements of stated in Rule 1.721(a)(1)(ii), CenturyLink is relying on the Exhibits submitted with its Formal Complaint.²

III. IDENTIFICATION OF PERSONS AND THE RELEVANT DOCUMENTS, DATA COMPILATIONS AND TANGIBLE THINGS

Pursuant to Section 1.721(a)(10)(iii) of the Commission's rules, CenturyLink provides that this information designation was prepared by CenturyLink's outside counsel, Perkins Coie LLP, in cooperation with CenturyLink's in-house counsel, and CenturyLink's employees and consultants (collectively, "CenturyLink"). Perkins Coie LLP, in coordination with CenturyLink, identified the primary persons with first-hand knowledge of the relevant facts. CenturyLink identified the relevant documents and data compilations attached to this Formal Complaint based on a review of the documents and data compilations, and other tangible things created, identified and/or gathered through the identification of billing errors and the filing of disputes with Verizon prior to the commencement of the Formal Complaint. Certain of the materials included among CenturyLink's Exhibits to the Formal Complaint were collected from the following sources: the files of Tiffany Brown; the files of Patrick Welch; the files of Joe Romero; and the files of Anne

² See Documents Relied Upon pursuant to Rule 1.721(a)(11), *infra*.

PUBLIC VERSION

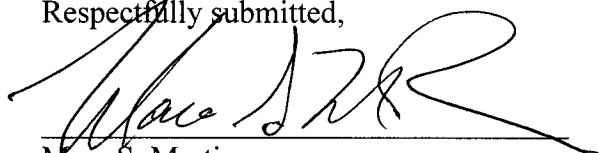
Grimm. Other material was obtained (i) from independent research of publicly available documents, and (ii) otherwise in connection with preparing CenturyLink's Formal Complaint.

Documents Relied Upon, Rule 1.721(a)(11)

Pursuant to Section 1.721(a)(11) of the Commission's Rules, 47 C.F.R. § 1.721(a)(11), attached as exhibits to the Formal Complaint are copies of the declarations, documents, data compilations and tangible things in CenturyLink's possession, custody, or control, upon which CenturyLink relies or intends to rely to support the facts alleged and legal arguments made in its Formal Complaint. As a result of the number, duration, and complexity of the billing issues, disputes, and correspondence between the parties, certain exhibits (such as native excel spreadsheets) are being provided in duplicate in order to provide a more complete record. The Formal Complaint cites to the parties' correspondence attaching those files where possible. Certain oversized exhibits are also being provided in electronic format. These exhibits have been served, along with the Formal Complaint, upon Verizon's counsel.

Dated: February 26, 2018

Respectfully submitted,



Marc S. Martin
Brendon P. Fowler
Michael A. Sherling
PERKINS COIE LLP
700 13th Street, N.W., Suite 600
Washington, D.C. 20005
Telephone: (202) 654-6200
MMartin@perkinscoie.com
BFowler@perkinscoie.com
MSherling@perkinscoie.com

Adam L. Sherr
CENTURYLINK COMMUNICATIONS, LLC
Associate General Counsel
1600 7th Avenue, Room 1506

PUBLIC VERSION

Seattle, WA 98191
Telephone: (206) 398-2507
Adam.Sherr@CenturyLink.com

Attorneys for CenturyLink Communications, LLC

Tab F

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
CenturyLink Communications, LLC f/k/a Qwest)
Communications Company, LLC,)
)
Complainant,)
v.)
)
Verizon Services Corp.; Verizon Virginia LLC;)
Verizon Washington, D.C., Inc.; Verizon Maryland)
LLC; Verizon Delaware LLC; Verizon)
Pennsylvania LLC; Verizon New Jersey Inc.;)
Verizon New York Inc.; Verizon New England Inc.;)
Verizon North LLC; Verizon South Inc.,)
)
Defendants.)

Docket No. 10-33
File No. EB-16-MDIC-0015

**CENTURYLINK COMMUNICATIONS, LLC'S FIRST REQUEST FOR
INTERROGATORIES TO VERIZON**

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

Pursuant to 47 C.F.R. § 1.729(a), CenturyLink Communications LLC, f/k/a Qwest Communications Company, LLC (“CenturyLink”), hereby submits to the Federal Communications Commission, and concurrently serves on the above-captioned defendants (individually and collectively, “Verizon”), this First Request for Interrogatories (“Interrogatories”). As further discussed below, the Interrogatories seek information necessary to the resolution of the disputes raised in the Formal Complaint, and that is not available from any other source. 47 C.F.R. § 1.729(b). Verizon shall respond to these Interrogatories in the time provided by 47 C.F.R. § 1.729, in writing, under oath, and in accordance with the Commission’s rules and the Instructions and Definitions set forth herein.

DEFINITIONS

1. All terms used herein shall be construed in an ordinary, common sense manner, and not in a hyper-technical, strained, overly-literal, or otherwise restrictive manner; however, acronyms and other terms of art in the telecommunications industry shall have the meaning typically ascribed to them by the industry.
2. “Agreements” means the 2009 Agreement and the 2014 Agreement.
3. “Any” means each, every, and all persons, places, or things to which the term refers.
4. “Communication” means any transfer of information, whether written, printed, electronic, oral, pictorial, or otherwise transmitted by any means or manner whatsoever.

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

5. “Concerning” means relating to, involving, reflecting, identifying, stating, referring to, evidencing, constituting, analyzing, underlying, commenting upon, mentioning, or connected with, in any way, the subject matter of the request.

6. “Contract Tariffs” mean the filed FCC tariff options implementing the 2009 Agreement (Tariff No. 1, § 21, Option 57; Tariff No. 11 § 32, Option 55; and Tariff No. 14 § 21, Option 29); and the 2014 Agreement (Tariff No. 1 § 21, Option 65; Tariff No. 11 § 32, Option 65; and Tariff No. 14 § 21, Option 34).

7. “Copy” means any reproduction, in whole or in part, of an original document and includes, but is not limited to, non-identical copies made from copies.

8. “Describe” and “description” means to set forth fully, in detail, and unambiguously each and every fact of which you have knowledge related to answering the Interrogatory.

9. “Document” means any written, drawn, recorded, transcribed, filed, or graphic matter, including scientific or researchers’ notebooks, raw data, calculations, information stored in computers, computer programs, surveys, tests and their results, however produced or reproduced. With respect to any document that is not exactly identical to another document for any reason, including but not limited to marginal notations, deletions, or redrafts, or rewrites, separate documents should be provided.

10. “FMS” or “FMS arrangement” means the Facilities Management Service

[[BEGIN CONFIDENTIAL]] [REDACTED]

[[END CONFIDENTIAL]] under Verizon Tariff FCC No. 1, Section 7.2.13(A), and Tariff No. 11, Section 7.2.16(A).

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

11. [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED] [[END CONFIDENTIAL]]

12. "Identify," "identity," or "identification," when used in relation to "person" or "persons," means to state the full name and present or last known address of such person or persons and, if a natural person, his or her present or last known job title, the name and address of his or her present or last known employer, and the nature of the relationship or association of such person to you.

13. "Identify," "identity," or "identification," when used in relation to "document" or "documents," means to state the date, subject matter, name(s) of person(s) that wrote, signed, initialed, dictated, or otherwise participated in the creation of the same, the name(s) of the addressee(s) (if any), and the name(s) and address(es) (if any) of each person or persons who have possession, custody, or control of said document or documents.

14. "Identify" when used in relation to a "communication" means to identify the participants in each communication and, if such communication is not contained in a document, the date, place, and content of such communication.

15. "Including" means including but not limited to.

16. "MSA" means the Master Services Agreement between the parties effective August 10, 2016.

17. "Original" means the first archetypal document produced, that is, the document itself, not a copy.

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

18. "Person" or "persons" means any natural person or persons, group of natural persons acting as individuals, group of natural persons acting as a group (*e.g.*, as a board of directors, a committee, *etc.*), or any firm, corporate entity, partnership, association, joint venture, business, enterprise, cooperative, municipality, commission, or governmental body or agency.

19. "Relevant Period" means March 1, 2009, to the present, unless otherwise specified.

20. "Tariff Filings" or "Contract Tariffs" means the contract tariffs filed with the Commission by Verizon via Transmittal No. 1261 (February 12, 2014) and Transmittal No. 1016 (May 15, 2009) which relate to the 2014 Service Agreement and the 2009 Service Agreement respectively.

21. "2014 Agreement" means the Service Agreement between the parties dated February 14, 2014, **[[BEGIN CONFIDENTIAL]]** [REDACTED]
[[END CONFIDENTIAL]]

22. "2009 Agreement" means the Service Agreement between the parties dated May 6, 2009, **[[BEGIN CONFIDENTIAL]]** [REDACTED]
[[END CONFIDENTIAL]]

23. "You," "your," or "Verizon" means Verizon Services Corporation and/or each of the above-captioned Verizon operating entities, as well as any parent, affiliated, or subsidiary companies; and employees, officers, directors, agents, representatives, and all other persons or entities acting or purporting to act on their behalf, including without limitation any outside consultant or witness retained by them. In that regard, each and every interrogatory contained herein is directed at you.

INSTRUCTIONS

When responding to the following interrogatories, please comply with the instructions below:

1. Each interrogatory is continuing in nature and requires supplemental responses as soon as new, different, or further information is obtained that is related to answering the interrogatory.
2. Provide all information, including all documents, related to answering the interrogatory that are in your possession, custody, or control, regardless of whether such documents are possessed directly by you or by your employees, officers, directors, agents, representatives, or any other person or entity acting or purporting to act on their behalf.
3. In lieu of producing any requested information or documents that were previously provided to CenturyLink in the informal complaint process, identify when and how such information or documents were previously provided to CenturyLink.
4. In any interrogatory, the present tense shall be read to include the past tense, and the past tense shall be read to include the present tense.
5. In any interrogatory, the singular shall be read to include the plural, and the plural shall be read to include the singular.
6. In any interrogatory, the use of the conjunctive shall be read to include the disjunctive, and the use of the disjunctive shall be read to include the conjunctive.
7. Any document withheld from production on the grounds of a privilege is to be specifically identified by author(s), addressee(s), length, and date, with a brief description of the subject matter or nature of the document, and a statement of the privilege asserted.

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

8. If you contend that any part of your response to a particular Interrogatory contains trade secrets or other proprietary or confidential business or personal information, such contention shall not provide a basis for refusing to respond within the time required by the applicable rules. You shall respond according to and consistent with the terms of the Protective Order entered by the Commission in this proceeding on February 9, 2018.

9. Please begin the response to each request on a separate page.

10. Please restate each interrogatory before providing the response or objection.

11. Please specify the interrogatory in response to which any document, narrative response, or objection is provided. If a document, narrative response, or objection relates to more than one request, please cross reference.

12. For each separate interrogatory, identify the person(s) under whose supervision the response was prepared.

13. If applicable, for any interrogatory consisting of separate subparts or portions, a complete response is required to each subpart as if the subpart or portion were propounded separately.

14. Produce any documents in the form of legible, complete, and true copies of the original documents as "original" is defined herein. To the extent that excel spreadsheets are produced, they should be provided in native format.

15. Please provide all documents in their native format, together with all metadata.

16. If you assert that documents or information related to answering an interrogatory are unavailable or have been discarded or destroyed, state when and explain in detail why any such document or information was unavailable, discarded, or destroyed, and identify the person

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

directing the discarding or destruction. If a claim is made that the discarding or destruction occurred pursuant to a discarding or destruction program, identify and produce the criteria, policy, or procedures under which such program was undertaken.

17. If any interrogatory cannot be answered in full after reasonable inquiry, provide the response to the extent available, state why the interrogatory cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.

INTERROGATORIES

CTL-VZ1: [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED] [[END CONFIDENTIAL]] the contract tariffs identify the requirements

[[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED] [[END CONFIDENTIAL]] fully describe the process, practice, and methodology by which Verizon determined [[BEGIN CONFIDENTIAL]]

[REDACTED]

[REDACTED] [[END CONFIDENTIAL]]

Explanation:

The information sought in this interrogatory is directly relevant to CenturyLink's overcharge disputes related to the 2009 Agreement, [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED]

[REDACTED] [[END CONFIDENTIAL]] This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information as to how it internally viewed the 2009 Agreement's requirements [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED] [[END CONFIDENTIAL]]

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

CTL-VZ 2: Please produce all documents (excluding those appended as Exhibits to CenturyLink's formal complaint) describing, explaining, summarizing, referencing, or otherwise relating to Verizon's process, practice, and methodology for **[[BEGIN CONFIDENTIAL]]**

[REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]**

Explanation:

The information sought in this interrogatory is directly relevant to CenturyLink's overcharge disputes related to the 2009 Agreement, **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]** This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information as to how it internally viewed the 2009 Agreement's requirements **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]**

CTL-VZ 3: [[BEGIN CONFIDENTIAL]] [REDACTED]
[REDACTED] [[END CONFIDENTIAL]] tariff provisions and definitions
identify the requirements [[BEGIN CONFIDENTIAL]] [REDACTED]
[REDACTED] [[END
CONFIDENTIAL]] Please fully describe the process, practice, and methodology by which
Verizon determined whether [[BEGIN CONFIDENTIAL]] [REDACTED]
[REDACTED] [[END CONFIDENTIAL]]

Explanation:

The information sought in this interrogatory is directly relevant to CenturyLink's
overcharge disputes related to the 2014 Agreement, [[BEGIN CONFIDENTIAL]] [REDACTED]
[REDACTED]

[REDACTED] [[END CONFIDENTIAL]] This information is not available to
CenturyLink through any source other than Verizon, and Verizon is the only source of
information as to how it internally viewed the 2014 Agreement's requirements [[BEGIN

CONFIDENTIAL]] [REDACTED]
[REDACTED] [[END
CONFIDENTIAL]]

CTL-VZ 4: Please produce all documents (excluding those appended as Exhibits to CenturyLink's formal complaint) describing, explaining, summarizing, referencing, supporting, or otherwise relating **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[REDACTED]

[REDACTED] **[[END**

CONFIDENTIAL]]

Explanation:

The information sought in this interrogatory is directly relevant to CenturyLink's overcharge disputes related to the 2014 Agreement, **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]** This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information as to how it internally viewed the 2014 Agreement's requirements **[[BEGIN**

CONFIDENTIAL]] [REDACTED]

[REDACTED] **[[END**

CONFIDENTIAL]]

CTL-VZ5: Regarding the period of the FMS arrangement, fully describe all processes, mechanisms, policies, and other methods by which Verizon attempted to meet its obligation to “maximize network efficiencies and to optimize economic efficiencies” pursuant to Verizon FCC Tariff No. 1 § 7.2.13(A) and Tariff No. 11 § 7.2.16(A), **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]]

Explanation:

The information sought in this interrogatory is directly relevant to CenturyLink’s overcharge claims related to Verizon’s obligation **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]] This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]]

CTL-VZ 6: Regarding the period of the FMS arrangement, please produce all analyses, reports, and other documents (excluding those appended as Exhibits to CenturyLink's formal complaint) describing, explaining, summarizing, referencing, supporting or otherwise relating to your response to Interrogatory CTL-VZ 5.

Explanation:

The information sought in this interrogatory is directly relevant to CenturyLink's overcharge claims related to Verizon's obligation to optimize circuit routing [[BEGIN
CONFIDENTIAL]] [REDACTED] [[END
CONFIDENTIAL]], and whether Verizon took any other related actions. This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information as to how it internally viewed its obligations under the FMS arrangement and what steps, if any, Verizon took to meet that obligation.

CTL-VZ7: For each claim identified in Table 9, Paragraph 70 of Century Link's Formal Complaint, fully describe the process and steps Verizon followed to receive, analyze, investigate and resolve each claim, and produce all documents (excluding those appended as Exhibits to CenturyLink's formal complaint) describing, explaining, summarizing, referencing, or otherwise relating to that process and steps.

Explanation:

The information sought in this interrogatory is directly relevant to Verizon's practices in impeding the dispute submission and resolution process under the contract tariffs, as well as to the manner in which Verizon used those practices to reject or deny credit disputes. This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information as to how it internally received, reviewed and processed disputes submitted by CenturyLink and how Verizon assessed whether the credits were affected.

CTL-VZ 8: Fully describe any and all efforts that Verizon took to adjust, update, or correct its calculation of quarterly credits on a going forward basis after Verizon's receipt of each of CenturyLink's claims for the quarters identified in Table 1, Paragraph 30 of Century Link's Formal Complaint.

Explanation:

The information sought in this interrogatory is directly relevant to whether Verizon took any corrective steps to mitigate continued overcharging after being placed on notice regarding its errors through CenturyLink's dispute submissions. This information is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]]

CTL-VZ9: Fully describe how Verizon ensured during the Relevant Period **[[BEGIN**

CONFIDENTIAL [REDACTED]
[REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]**, including any mechanisms or processes in place to eliminate double-counting and any individuals involved in investigating potential double-counting issues.

Explanation:

The information sought in this interrogatory is directly relevant **[[BEGIN**
CONFIDENTIAL]] [REDACTED] **[[END**
CONFIDENTIAL]], which Verizon claims it did not do despite evidence to the contrary. Information regarding Verizon's internal compliance processes and bill error review efforts or mechanisms is not available to CenturyLink through any source other than Verizon, and Verizon is the only source of information **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[REDACTED] **[[END CONFIDENTIAL]]**

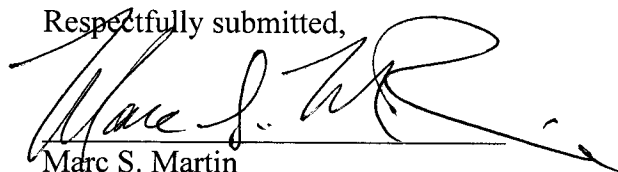
CTL-VZ 10: Please identify each customer of Verizon's who subscribed to the tariff options referenced in the complaint related to the **[[BEGIN CONFIDENTIAL]]** **[[END CONFIDENTIAL]]**, or who subscribed to a similar Flat Rate Pricing option in another tariff, that during the Relevant Period submitted billing disputes or other communications to Verizon alleging that Verizon incorrectly calculated that customer's quarterly credit or other similar credit for the purposes of their Flat Rate Pricing option, and for each such dispute or communication identify the time frame of the dispute, fully describe the nature of the dispute or communication as submitted to Verizon, and fully describe how Verizon resolved that dispute or communication.

Explanation:

The information sought in this interrogatory is directly relevant to whether Verizon was on notice from customers other than CenturyLink of the same or similar calculation errors and circuit count issues. Information regarding Verizon's internal assessment, if any, of disputes submitted by CenturyLink and whether Verizon even accepted certain disputes for internal review is not otherwise available to CenturyLink, and Verizon is the only source of this information.

Dated: February 26, 2018

Respectfully submitted,



Marc S. Martin
Brendon P. Fowler
Michael A. Sherling
PERKINS COIE LLP

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

700 13th Street, N.W., Suite 600
Washington, D.C. 20005
Telephone: (202) 654-6200
MMartin@perkinscoie.com
BFowler@perkinscoie.com
MSherling@perkinscoie.com

Adam L. Sherr
CENTURYLINK COMMUNICATIONS, LLC
Associate General Counsel
1600 7th Avenue, Room 1506
Seattle, WA 98191
Telephone: (206) 398-2507
Adam.Sherr@CenturyLink.com

Attorneys for CenturyLink Communications, LLC

Tab G

PUBLIC VERSION

TABLE OF EXHIBITS

| Ex. No. | Document Description |
|----------------|--|
| 1 | Master Services Agreement (MSA) between Qwest Communications and Verizon Communications (Aug. 11, 2006) |
| 2 | MSA Attachment 11 - Special Access Overlay Ethernet Adjustment Agreement (May 6, 2009) |
| 3 | 2009 Service Agreement between Verizon Services Corp. and Qwest Communications (May 6, 2009) |
| 4 | MSA Attachment 13 - Tiered Pricing Product Schedule between Qwest Communications and Verizon Services Corp. (Feb. 14, 2014) |
| 5 | 2014 Service Agreement between Verizon Services Corp. and Qwest Communications (Feb. 14, 2014) |
| 6 | Amended and Restated Attachment 2 to the Verizon Partner Solutions MSA ("Attachment 2") between Verizon Services Corp. et al. and Qwest Communications (May 6, 2009) |
| 7 | Amendment Number 1 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (Nov. 11, 2010) |
| 8 | Amendment Number 2 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (Feb. 24, 2011) |
| 9 | Amendment Number 3 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (Sep. 7, 2012) |
| 10 | Amendment Number 4 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (Oct. 2, 2012) |
| 11 | Amendment Number 6 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (Feb. 14, 2014) |
| 12 | Amendment Number 9 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (Feb. 19, 2015) |
| 13 | Amendment Number 12 to Attachment 2 to the MSA between Verizon Services Corp. et al. and Qwest Communications (May 6, 2016) |
| 14 | Verizon Tariff F.C.C. No. 1, Section 21.58, Contract Tariff Option 57 (May 30, 2009) |
| 15 | Verizon Tariff F.C.C. No. 11, Section 32.56, Contract Tariff Option 55 (May 30, 2009) |
| 16 | Verizon Tariff F.C.C. No. 14, Section 21.30, Contract Tariff Option 29 (May 30, 2009) |
| 17 | Verizon Tariff F.C.C. No. 1, Section 21.66, Contract Tariff Option 65 (Feb. 27, 2014) |

PUBLIC VERSION

| Ex. No. | Document Description |
|----------------|--|
| 18 | Verizon Tariff F.C.C. No. 11, Section 32.66, Contract Tariff Option 65 (Feb. 27, 2014) |
| 19 | Verizon Tariff F.C.C. No. 14, Section 21.35, Contract Tariff Option 34 (Feb. 27, 2014) |
| 20 | Verizon Tariff F.C.C. No. 1, Section 2, General Regulations |
| 21 | Verizon Tariff F.C.C. No. 1, Section 7, Special Access Service |
| 22 | Verizon Tariff F.C.C. No. 1, Section 7.2.13, Facilities Management Service# |
| 23 | Verizon Tariff F.C.C. No. 1, at § 21.22(E)(2)(e)(1); § 21.24(E)(2)(e)(1); § 21.56(E)(2)(c)(2); § 21.57(I)(3); § 21.57(Q)(4) |
| 24 | Verizon Tariff F.C.C. No. 11, Section 7.1.2, Rate Categories |
| 25 | Verizon Tariff F.C.C. No. 11, Section 7.2.16, Facilities Management Service |
| 26 | Verizon Tariff F.C.C. No. 14, Section 5.1, General |
| 27 | Verizon Tariff F.C.C. No. 16, Section 7.2, Rate Categories, Applications and Regulations |
| 28 | Verizon Transmittal No. 1016, Description Letter (May 15, 2009) |
| 29 | Verizon Transmittal No. 1261, Description Letter (Feb. 12, 2014) |
| 30 | CenturyLink Verizon Timelines |
| 31 | Dispute Category 1 - Miscalculating Equivalents for DS3 CLF Units (updated) |
| 32 | Dispute Category 2 - Including Units Without USOCs (updated) |
| 33 | Dispute Category 3 - Double-Counting Units (updated) |
| 34 | Dispute Category 4 - Misdesignating DS3 CLF Units (updated) |
| 35 | Dispute Category 5 - Misdesignating DS0 Units (updated) |
| 36 | Dispute Category 6 - Failure to Optimize Circuit Routing (updated) |
| 37.01 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Apr 2013</i> , dated May 13, 2013 |
| 37.01a | Email attachment |
| 37.02 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY5Q1 with disputes</i> , dated Jul. 25, 2013 |
| 37.02a | Email attachment |
| 37.02b | Email attachment |
| 37.02c | Email attachment |
| 37.02d | Email attachment |
| 37.03 | Email from submit.claims@verizon.com to Patrick Lowell (CenturyLink), <i>Letter of Acknowledgement - Batch Number: 40795340</i> , dated Aug. 5, 2014 |

PUBLIC VERSION

| Ex. No. | Document Description |
|----------------|---|
| 37.03a | Email attachment |
| 37.04 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-May 2013</i> , dated Jun. 18, 2013 |
| 37.04a | Email attachment |
| 37.05 | Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), <i>FW: Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY5Q1 with disputes (Verizon)</i> , dated Jul. 29, 2013 |
| 37.05a | Email attachment |
| 37.05b | Email attachment |
| 37.06 | Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, <i>FW: CCQWC083326 CenturyLink - Verizon South Claim; BAN: 412M520008196</i> , dated Jul. 31, 2014 |
| 37.06a | Email attachment |
| 37.06b | Email attachment |
| 37.06c | Email attachment |
| 37.06d | Email attachment |
| 37.06e | Email attachment |
| 37.07 | 40794911 7.31.14 zip file |
| 37.08 | Centurylink PY5Q1_DS1 DS3 FMS MRC |
| 37.09 | Centurylink PY5Q1_DS3 CLF_CLS Billed Units |
| 37.10 | Centurylink (QWEST) Monthly Tracking Report, Apr 2013 |
| 37.11 | Centurylink (QWEST) Monthly Tracking Report, May 2013 |
| 37.12 | Centurylink (QWEST) Monthly Tracking Report PY5Q1_w_disputes |
| 37.13 | Letter of Acknowledgement 40795340 8-5-14 zip file |
| 37.14 | PY5Q1 Centurylink BAN (send) |
| 37.15 | Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), <i>Verizon Claim Status Letter - Batch Number: 40794911</i> , dated Jul. 31, 2014 |
| 38.01 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Joseph Romero (CenturyLink), <i>RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Aug 2013</i> , dated Oct. 25, 2013 |
| 38.01a | Email attachment |
| 38.01b | Email attachment |
| 38.02 | Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), <i>FW: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Aug 2013 (PY5Q2)</i> , dated Oct. 29, 2013 |

PUBLIC VERSION

| Ex. No. | Document Description |
|---------|---|
| 38.02a | Email attachment |
| 38.03 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jul 2013</i> , dated Aug. 15, 2013 |
| 38.03a | Email attachment |
| 38.04 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jun 2013</i> , dated Jul. 12, 2013 |
| 38.04a | Email attachment |
| 38.05 | Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, <i>FW: CCQWC083325 CenturyLink - Verizon South Claim; BAN: 412M520008196</i> , dated Jul. 31, 2014 |
| 38.05a | Email attachment |
| 38.05b | Email attachment |
| 38.05c | Email attachment |
| 38.05d | Email attachment |
| 38.05e | Email attachment |
| 38.06 | 40794915 7.31.14 zip file |
| 38.07 | Centurylink (QWEST) Monthly Tracking Report_Aug 2013 w dispute revised |
| 38.08 | Centurylink (QWEST) Monthly Tracking Report_Aug 2013 w dispute |
| 38.09 | Centurylink (QWEST) Monthly Tracking Report_Jul 2013 |
| 38.10 | Centurylink (QWEST) Monthly Tracking Report_Jun 2013 |
| 38.11 | Letter of Acknowledgement 40795381 8-5-14 zip file |
| 38.12 | PY5Q2 Centurylink DS3 CLF_CLS Billed Units |
| 38.13 | Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), <i>Verizon Claim Status Letter - Batch Number: 40794915</i> , dated Jul. 31, 2014 |
| 39.01 | Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), <i>RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2013 (PY5Q3)</i> , dated Feb. 4, 2014 |
| 39.02 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Oct 2013</i> , dated Nov. 14, 2013 |
| 39.02a | Email attachment |
| 39.02b | Email attachment |
| 39.02b1 | Email attachment |
| 39.02c | Email attachment |
| 39.02c1 | Email attachment |

PUBLIC VERSION

| Ex. No. | Document Description |
|----------------|---|
| 39.03 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), <i>RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2013</i> , dated Jan. 2, 2014 |
| 39.03a | Email attachment |
| 39.03b | Email attachment |
| 39.04 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Sep 2013 - Verizon</i> , dated Oct. 14, 2013 |
| 39.04a | Email attachment |
| 39.05 | Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, <i>FW: CCQWC083324 CenturyLink - Verizon South Claim; BAN: 412M520008196</i> , dated Jul. 31, 2014 |
| 39.05a | Email attachment |
| 39.05b | Email attachment |
| 39.05c | Email attachment |
| 39.05d | Email attachment |
| 39.05e | Email attachment |
| 39.06 | 40794919 7.31.14 zip file |
| 39.07 | Centurylink (QWEST) Monthly Tracking Report, Nov 2013 |
| 39.08 | Centurylink (QWEST) Monthly Tracking Report, Oct 2013 |
| 39.09 | Centurylink (QWEST) Monthly Tracking Report, Sep 2013 |
| 39.10 | Letter of Acknowledgement 40795380 8-5-2014 zip file |
| 39.11 | PY5Q3 Centurylink DS1_DS3_FMS MRC |
| 39.12 | PY5Q3 Centurylink DS3 CLF_CLS Billed Units |
| 39.13 | Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), <i>Verizon Claim Status Letter - Batch Number: 40794919</i> , dated Jul. 31, 2014 |
| 40.01 | Email exchanges between Tiffany Brown (CenturyLink) and Joseph Aguilar (Verizon), <i>RE: Dispute associated w/Credit Calculation - Verizon</i> , dated 2014 |
| 40.01a | Email attachment |
| 40.02 | Email from Joseph Aguilar (Verizon) to Joseph Romero (CenturyLink), <i>RE: FRP Disputes</i> , dated Aug. 5, 2014 |
| 40.03 | Email from Joseph Aguilar (Verizon) to Patrick Lowell (CenturyLink), Tiffany Brown (CenturyLink), Anne Grimm (CenturyLink), Joseph Romero (CenturyLink), <i>RE: Dispute associated w/Credit Calculation - Verizon</i> , dated Nov. 21, 2014 |
| 40.04 | Email exchanges among Patrick Lowell (CenturyLink), Joseph Aguilar (Verizon), Joseph Romero (CenturyLink) and Tiffany Brown (CenturyLink), <i>RE: Disputes</i> |

PUBLIC VERSION

| Ex. No. | Document Description |
|---------|---|
| | <i>Associated with Verizon's credit calculation, dated winter 2015</i> |
| 40.05 | Email exchanges between Patrick Welch (CenturyLink) and Joseph Aguilar (Verizon), <i>RE: CSP Dispute</i> , dated spring 2015 |
| 40.06 | Email from Joseph Aguilar (Verizon) to Patrick Lowell (CenturyLink), <i>RE: CSP Dispute</i> , dated May 4, 2015 |
| 40.07 | Email from Patrick Welch (CenturyLink) to David Szol (Verizon), <i>FW: Dispute associated w/Credit Calculation - Verizon</i> , dated Sep. 9, 2015 |
| 40.08 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Dec 2013</i> , dated Jan. 20, 2014 |
| 40.08a | Email attachment |
| 40.09 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2014</i> , dated Mar. 17, 2014 |
| 40.09a | Email attachment |
| 40.09b | Email attachment |
| 40.10 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2014</i> , dated Mar. 14, 2014 |
| 40.10a | Email attachment |
| 40.11 | Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), <i>Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jan 2014</i> , dated Feb. 17, 2014 |
| 40.11a | Email attachment |
| 40.12 | Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), <i>RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2014</i> , dated May 9, 2014 |
| 40.13 | Email from Joseph Romero (CenturyLink) to Joseph Aguilar (Verizon), <i>Dispute</i> , dated Jun. 18, 2014 |
| 40.13a | Email attachment |
| 40.13b | Email attachment |
| 40.13c | Email attachment |
| 40.13d | Email attachment |
| 40.14 | Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), <i>Verizon Claim Status Letter - Batch Number: 40789586</i> , dated Jun. 19, 2014 |
| 40.15 | Centurylink (QWEST) Monthly Tracking Report, Dec 2013 |
| 40.16 | Centurylink (QWEST) Monthly Tracking Report, Feb 2014 |